

Vanessa R. Waldref
United States Attorney
Eastern District of Washington
Richard R. Barker
Assistant United States Attorney
Post Office Box 1494
Spokane, WA 99210-1494
Telephone: (509) 353-2767

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

DEC 20 2022

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDRE PIERRE PICARD,

Defendants.

2:22-CR-173-TOR

INDICTMENT

Vio: 21 U.S.C. § 841(a)(1),
(b)(1)(C)
Distribution of Heroin
(Count 1)

21 U.S.C. § 841(a)(1),
(b)(1)(C)
Distribution of
Methamphetamine
(Counts 2, 4)

21 U.S.C. § 841(a)(1),
(b)(1)(C)
Distribution of Fentanyl
(Counts 3, 5-6)

21 U.S.C. § 853
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

On or about April 28, 2020, in the Eastern District of Washington, the
Defendant, ANDRE PIERRE PICARD, knowingly and intentionally distributed a

INDICTMENT – 1

1 mixture or substance containing a detectable amount of heroin, a Schedule I
2 controlled substance, all in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

3
4 COUNT 2

5 On or about April 14, 2022, in the Eastern District of Washington, the
6 Defendant, ANDRE PIERRE PICARD, knowingly and intentionally distributed a
7 mixture or substance containing a detectable amount of methamphetamine, a
8 Schedule II controlled substance, all in violation of 21 U.S.C. § 841(a)(1),
9 (b)(1)(C).

10
11 COUNT 3

12 On or about April 14, 2022, in the Eastern District of Washington, the
13 Defendant, ANDRE PIERRE PICARD, knowingly and intentionally distributed a
14 mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-
15 phenylethyl)-4-piperidinyl] propanamide (a/k/a fentanyl), a Schedule II controlled
16 substance, all in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

17
18 COUNT 4

19 On or about May 4, 2022, in the Eastern District of Washington, the
20 Defendant, ANDRE PIERRE PICARD, knowingly and intentionally distributed a
21 mixture or substance containing a detectable amount of methamphetamine, a
22 Schedule II controlled substance, all in violation of 21 U.S.C. § 841(a)(1),
23 (b)(1)(C).

24
25 COUNT 5

26 On or about May 4, 2022, in the Eastern District of Washington, the
27 Defendant, ANDRE PIERRE PICARD, knowingly and intentionally distributed a
28 mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-
phenylethyl)-4-piperidinyl] propanamide (a/k/a fentanyl), a Schedule II controlled
substance, all in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 6

On or about December 7, 2022, in the Eastern District of Washington, the Defendant, ANDRE PIERRE PICARD, knowingly and intentionally distributed a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide (a/k/a fentanyl), a Schedule II controlled substance, all in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense of violation of 21 U.S.C. §§ 841(b)(1)(C), as set forth in this Indictment, the Defendant, ANDRE PIERRE PICARD, shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense(s) and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense(s).

If any forfeitable property, as a result of any act or omission of the Defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty,

//

//

//

//

1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p).

3
4 DATED this 20 day of December, 2022.

5 A TRUE BILL

6
7
8
9 Vanessa Waldref
10 Vanessa R. Waldref
11 United States Attorney

12 Richard R. Barker
13 Richard R. Barker
14 Assistant United States Attorney
15
16
17
18
19
20
21
22
23
24
25
26
27
28